

FILED

AO 91 (Rev. 11/11) Criminal Complaint

MAR 11 2025

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY EG  
DEPUTY CLERK

United States of America

v.

Jorge Ambros Lopez

Case No.

EP 25-M-1004-RFC

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 9, 2025 in the county of El Paso in the  
Western District of Texas, the defendant(s) violated:*Code Section*

21 U.S.C. 952 (a) &amp; 960(b)(1)(H)

*Offense Description*Importation of controlled substances: more than 500 grams of  
methamphetamine.

This criminal complaint is based on these facts:

See Attachment A.

☒ Continued on the attached sheet.Oath Telephonically Sworn  
At 1:12 PM  
Fed.R.Crim.P.4.1(b)(2)(A)

Complainant's signature

Felix Ortegon, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/11/2025City and state: El Paso, Texas

Judge's signature

Robert F. Castaneda, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT:**

On March 9<sup>th</sup>, 2025, at approximately 7:53 a.m. U.S. Customs and Border Protection Officers (CBPO) at the Area Port of Ysleta in El Paso, Texas, observed a blue in color Honda Civic bearing Mexican plates of EGK011B, approach vehicle lane 3. CBP Officer made contact with the male driver. The male driver presented his Border Crossing Card, bearing the name Jorge Ambros Lopez with a date of birth of June 26, 1987. A conversation ensued between CBP Officer and Lopez. Lopez stated he was the owner of the vehicle, was not bringing anything from Mexico, and was going to El Paso. CBP Officer referred Lopez to Secondary at approximately 7:55 a.m. for additional inspections.

At Secondary, CBP Officer had another brief conversation with Lopez. Lopez stated he was coming from Juarez, Mexico and was traveling to Academy Sports and Outdoors in El Paso. The purpose for his travel to Academy Sports and Outdoors was to buy tents so that he could resell them in Juarez. CBP Officer asked if he had anything to declare to include Alcohol, Tobacco, Medications, Ammunition, Weapons, Drugs or Narcotics. Lopez stated no. He also stated he was the owner of the vehicle he was operating. Lopez was asked if he was responsible for everything inside his vehicle, to which he stated, yes. Lopez was the sole occupant in the vehicle.

During the additional inspections conducted by CBP Officers, a K-9 Officer was requested. The CBP K-9 Officer conducted an intensive inspection with her assigned canine Sherry, which is a trained Human/Narcotic Detector Dog (HNDD). The canine alerted at approximately 8:00 a.m. CBP Officers began to inspect the vehicle and noticed a small to medium sized white oval shaped packages taped and stored on the left quarter panel. At this

time, CBP Officers apprehended Lopez. CBP Officers continued to inspect the vehicle and found more white oval shaped packages taped and stored on the right quarter panel.

At approximately 9:35 a.m., After extracting 32 white oval shaped packages from the vehicle, a random bundle was cut open and a crystal-like substance was exposed. The crystal-like substance was tested by the Thermo-Scientific GEMINI. At approximately 9:36 a.m., the crystal-like substance tested positive for chemical properties of d-Methamphetamine hydrochloride. The total weight of all packages extracted from the vehicle was approximately 15.24kgs/ 33.60lbs.

U.S. Customs Border Protection Officer, a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) and Special Agents from the FBI responded to U.S. Customs and Border Protection – Ysleta Port of Entry to conduct an interview with Lopez. After identifying themselves to Lopez, Lopez was advised of his rights to which Lopez stated that he understood his rights and agreed to answer questions without an attorney present. During the interview, Lopez stated that he was to be paid a total of \$1,000 for transporting packages across the border. When asked if he knew what were in those packages, he stated he had an inclination it was a type of narcotic.

The plan was for Lopez to park his blue in color Honda Civic at the Academy Sports and Outdoor parking lot while the narcotics were extracted from his vehicle. Towards the end of the interview, Lopez admitted to transporting an unknown amount of narcotics outside of El Paso before. He had done this twice before and was paid \$1500.00 for each transport. He was only being paid \$1,000 for the current transport because it wasn't outside of El Paso.

Agents contacted the United States Attorney's Office who accepted prosecution. Lopez was transported to the El Paso Country Jail for booking.

Based upon the facts set forth in this affidavit, there is probable cause to believe that Jorge Ambros Lopez committed a violation of Title 21 U.S.C. 952 (a) & 960(b)(1)(H) Importation of controlled substances: more than 500 grams of methamphetamine. This affidavit does not set forth all known facts regarding this investigation but only those facts which establish probable cause.